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FILED
HARRISBURG, F

MAR 11 2003

MARY E. D'ANDREA, C
Per 9/8

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA

WILLIAM CLARK,
Plaintiff

NO.: 1:CV01-0764

v.

(JUDGE CALDWELL)

MARTIN HORN, Secretary,
Pennsylvania Department of
Corrections, et al.,
Defendants

JURY TRIAL DEMANDED

WEXFORD DEFENDANTS' MOTION FOR
ENLARGEMENT OF TIME TO FILE A BRIEF

AND NOW, come the Wexford Defendants, by and through their attorneys, Lavery, Faherty, Young & Patterson, P.C., and file this Motion for Enlargement of Time to file a Brief and in support thereof, aver as follows:

1. Pending for disposition before this Honorable Court is the Wexford Defendants' Motion for Summary Judgment.

2 On or about February 24, 2003, Plaintiff filed a combined pleading in opposition to the Wexford Defendants' Motion for Summary Judgment and seeking summary judgment in favor of the Plaintiff.

3. Pursuant to the Local Rules of Court, the Wexford Defendants' Brief in Opposition to Plaintiff's Motion for Summary Judgment is due on March 11, 2003.

4. Due to previously scheduled commitments in other matters, including pretrial preparations, dispositive motions in other federal cases, and responsive pleadings in state court actions, undersigned defense counsel is requesting an enlargement of time until Friday, March 14, 2003, within which to file the Wexford Defendants' Brief in opposition to Plaintiff's Request for Summary Judgment.

5. The requested extension of time is brief in duration; it will not prejudice Plaintiff's substantive rights; and it will not unduly delay the adjudication of this matter on the merits.

WHEREFORE, the Wexford Defendants respectfully request this Honorable Court grant their Motion for Enlargement of Time to file a Brief and enter the accompanying Court Order.

Respectfully submitted,

Lavery, Faherty, Young &
Patterson, P.C.

By: 

James D. Young, Esquire
Atty No. 53904

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Harrisburg, PA 17108-1245

Attys for the Wexford Defendants

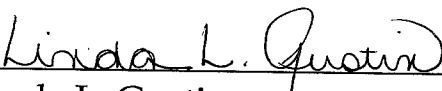
DATE: 3/11/2003

CERTIFICATE OF SERVICE

I, Linda L. Gustin, an employee with the law firm of Lavery, Faherty, Young & Patterson, P.C., do hereby certify that on this 11th day of March, 2003, I served a true and correct copy of the foregoing **Wexford Defendants' Motion for Enlargement of Time to File a Brief** via U.S. First Class mail, postage prepaid, addressed as follows:

William Clark
SCI-Rockview
Box A
Bellefonte, PA 16823-0820

John Talaber, Esquire
Office of Chief Counsel
PA Department of Corrections
55 Utley Drive
Camp Hill, PA 17011



Linda L. Gustin